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April 7, 2023

VIA ECF

The Honorable Gregory H. Woods
United States District Court
Southern District of New York
500 Pearl Street, Room 2260
New York, NY 10007

Re: John Doe v. Columbia, No. 1:20-cv-06770-GHW

Dear Judge Woods:

As you know, the undersigned represents Plaintiff John Doe (“John”) in this case. Columbia counsel has just filed a letter with a proposed Protective Order claiming that I refused to do a joint letter. Simply put, that is a lie. Last Saturday April 1, 2023, I sent to Columbia counsel what was to be a joint letter which was originally drafted by Columbia counsel. Accompanying this letter is what was to be the joint letter that I sent to Columbia counsel on April 1 and the cover e-mail. Columbia counsel, however, decided to rewrite the letter and yesterday afternoon sent it to me. I rejected it as a joint letter because it was really a Columbia brief, not a joint letter. Columbia counsel decided to file it anyway. I request that you reject the submission of Columbia counsel’s letter as a violation of your Honor’s Rules requiring joint letters.

Very truly yours,
NESENOFF & MILTENBERG LLP
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